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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

KAROLINA MARIA MARCINIAK-DOMINGUES
GONCALVES AGRA,

Plaintiff,

-against-

ROCKEFELLER UNIVERSITY; FREDERICO
AZEVEDO and WINRICH FREIWALD,

Defendants.

No. 22-cv-10959 (ALC)

**DEFENDANTS THE
ROCKEFELLER
UNIVERSITY AND DR.
WINRICH FREIWALD'S
NOTICE OF MOTION TO
DISMISS PLAINTIFF'S
THIRD AMENDED
COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the Declaration of Elise M. Bloom, Esq. with the exhibits annexed thereto, and all of the prior pleadings and proceedings in this action, Defendants The Rockefeller University ("RU") and Dr. Winrich Freiwald ("Dr. Freiwald") (collectively the "RU Defendants"), through their undersigned counsel, will move this Court before the Honorable Andrew L. Carter, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007 on such a date and time as the Court may direct, for an Order pursuant to Federal Rule of Civil Procedure 12(b)(6) dismissing with prejudice all claims against the RU Defendants in Plaintiff's Third Amended Complaint (ECF No. 136) and granting such other and further relief as the Court deems just and proper.

Dated: May 20, 2025
New York, New York

Respectfully submitted,

/s/ Elise M. Bloom

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